

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

SHANTE WATSON, on behalf of herself)	
and others similarly situated,)	
)	
Plaintiff,)	CIVIL ACTION NO.:
)	1:25-CV-00682-SEG
v.)	
)	CLASS ACTION LAWSUIT
HOLLIS COBB ASSOCIATES, INC.,)	
)	
Defendant.)	

**CONSENT MOTION EXTENDING TIME FOR DEFENDANT
TO RESPOND TO PLAINTIFF’S DISCOVERY**

Defendant Hollis Cobb Associates, Inc. (“Defendant”) with the consent of Plaintiff, move this Honorable Court for an extension of time within which this Defendant may answer, move, object or otherwise respond to Plaintiff’s initial written discovery requests up through and including, June 24, 2025. Defendant shows in support as follows:

Plaintiff’s Class Action Complaint seeks damages under the Telephone Consumer Protection Act (“TCPA”) 47 U.S.C. § 227. [Doc. #1]. Plaintiff served Defendant on February 18, 2025. Defendant answered on April 1, 2025 [Doc. #11]. On May 1, 2025, Plaintiff served Defendant with its initial written discovery requests

including interrogatories, request for production of documents, and request for admissions. The Parties previously agreed to extend the time for Defendant to respond to Plaintiff's initial written discovery up and through June 17, 2025.

Defendant is in the process of collecting and reviewing the information requested in the Plaintiff's initial written discovery and preparing written responses to same. It has become apparent to Defendant that additional time is needed to fully and completely respond to the discovery request. Plaintiff has agreed to extend Defendant's time to respond in order to allow additional time for Defendant's counsel to gather information about the claim and prepare a response to Plaintiff's initial discovery. Defendant will respond to Plaintiff's initial discovery on or before July 24, 2025. This extension will not delay the progress of this matter or the trial of the case.

With consent of Plaintiff, Defendant respectfully requests this Court issue an order extending the time for Defendant to answer, move, object or otherwise respond to Plaintiff's initial written discovery requests up through and including, June 24, 2025. A proposed Order granting the extension has been filed with this motion.

This 16th day of June, 2025.

**SCRUDDER, BASS, QUILLIAN,
HORLOCK, LAZARUS & ADELE LLP**

/s/ William W. Horlock, Jr. _____

William W. Horlock, Jr.

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/s/Valerie Chinn

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/s/ Anthony Paronich

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Admitted pro hac vice

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CERTIFICATE OF SERVICE¹

I hereby certify that I filed the attached ***CONSENT MOTION EXTENDING TIME FOR DEFENDANT TO RESPOND TO PLAINTIFF'S DISCOVERY*** with the Clerk of Court using the CM/ECF system which will automatically send electronic mail notifications of such filing to the following counsel of record:

Valerie Chinn, Esq.
Chinn Law Firm, LLC
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Anthony Paronich, Esq.
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This 16th day of June, 2025.

/s/ William W. Horlock, Jr.
William W. Horlock, Jr.

¹ The undersigned counsel certifies that this document has been prepared in Times New Roman 14-point font in accordance with L.R. 5.1.

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NORTHERN DISTRICT OF GEORGIA
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**PROPOSED ORDER GRANTING
CONSENT MOTION EXTENDING TIME FOR DEFENDANT
TO RESPOND TO PLAINTIFF'S DISCOVERY**

IT IS HEREBY ORDERED that the Parties Consent Motion extending the time for Hollis Cobb Associates, Inc. to respond to the Plaintiff's Initial Written Discovery Requests to Defendant is GRANTED.

It is hereby ordered that the time in which Hollis Cobb Associates, Inc. shall have to answer, move, object or otherwise respond to Plaintiff's Initial Written Discovery Requests to Defendant including Interrogatories, Requests for Production, and Requests for Admission is hereby extended up and until June 24, 2025.

IT IS SO ORDERED, this _____ day of _____, 2025.

The Honorable Sarah E. Geraghty
UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF
GEORGIA-ATLANTA DIVISION

Respectfully submitted this 16th day of June, 2025.

**SCRUDDER, BASS, QUILLIAN,
HORLOCK, LAZARUS & ADELE LLP**

/s/ William W. Horlock, Jr.

William W. Horlock, Jr.

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This 16th day of June, 2025.

/s/ William W. Horlock, Jr.
William W. Horlock, Jr.

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